

MEMORANDUM

To: Reviewers

Through: Dan Olson, Administrator, Air Quality Division
Michael Stoll, Operating Permit Program Manager

From: Kurt Smith, Air Quality Engineer

Subject: Draft Operating Permit 30-151-1 for Sinclair Oil Corporation
Sinclair Casper Refinery

Date: August 10, 2004

Attached for your review is a modified draft Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit for the Sinclair Oil Corporation's Sinclair Casper Refinery. The permit is being modified to include requirements from permit MD-697 issued on 10/29/02 which required the addition of pole sleeve systems to tanks 623 and 624.

WAQSR Chapter 6, Section 2 Permits and Waivers

Waiver AP-7Y1 (9/5/01): allowed an increase in the recovery of light hydrocarbon gases that would normally be sent to the flare for combustion. No conditions were included in the permit, but the modification must comply with applicable requirements of 40 CFR 60 Subpart GGG and 40 CFR 63 Subpart CC.

Waiver AP-0778 (5/20/03): was issued to allow the commercial testing of a new catalyst system for the catalytic hydro-desulfurizer reactor. By permit condition, unless the unit is converted back an air quality permit will be required within two years of commencing the commercial test. All conditions from permit MD-409 remain in effect and enforceable. Since, no conditions of the operating permit are contravened, the operating permit is not being modified at this time.

Waiver AP-0680 (6/19/03): allowed the sour water stripper off gas to be routed to the sulfur recovery unit. As of August 19, 2003 no physical work was started on this project. No conditions were included in the waiver, but the modification must comply with applicable requirements of 40 CFR 60 Subpart GGG and 40 CFR 63 Subpart CC.

Waiver AP-0779 (6/19/03): modified the second phase of the project to increase the recovery of light hydrocarbon gases that are otherwise sent to the flare for combustion. The first phase of the project was completed. No conditions were included in the waiver, but the modification must comply with applicable requirements of 40 CFR 60 Subpart GGG and 40 CFR 63 Subpart CC.

Waiver AP-1129 (8/27/03): was issued as a temporary waiver to process additional feed from the Sinclair Wyoming refinery at the Casper Wyoming refinery.

Waiver AP-1594 (2/5/04): allowed installation of approximately 200 feet of new 4 inch piping between tanks 207 and 624. No conditions were included in the waiver, but the modification must comply with applicable requirements of 40 CFR 60 Subpart GGG and 40 CFR 63 Subpart CC.

Permit MD-697 (10/29/02): was issued to fulfill the requirements of a Storage Tank Emission Reduction Partnership Program agreement. Conditions of the permit include requirements for the construction and inspection of the modifications. All modifications of the tanks have been completed. The operating permit is also being updated to include the requirements from 40 CFR 63 Subpart UUU. According to the permittee, 40 CFR 63 Subparts EEEE, FFFF, GGGGG, and ZZZZ are not applicable to the facility. The initial notification stating the facility is not subject to 40 CFR 63 Subpart GGGGG was submitted on 2/5/04.

Modifications

The following information and conditions have been changed in operating permit 30-151-1 to include the requirements from permit MD-697, 40 CFR 63 Subpart UUU, and Chapter 14, Section 3; and make the permit consistent with other Chapter 6, Section 3 operating permits being issued by the Division at this time. Permit revisions include:

- The total facility estimated emissions table is updated to reflect the reduction of volatile organic compound (VOC) emissions from the addition of pole sleeve systems to the tanks.
- SO₂ emissions inventory requirements of Chapter 14, Section 3 are added to the permit in conditions F2, F30, and F40.
- Requirements for tanks 623 and 624 are added to conditions F13, F27, and F47.
- 40 CFR 63 Subpart UUU requirements are added to the permit.
- The Compliance Certifications in condition C1 is updated to reflect the conditions described above.
- The stratospheric ozone protection requirements which were previously listed with the source specific requirements are now included in the revised General Conditions (condition G24) The General conditions are also updated to include G22, Asbestos; and G23, Fugitive Dust.
- Appendix J, Subpart CC Equipment List, is modified to designate tanks 623 and 624 as group 1 storage vessels.
- Subpart UUU is attached as Appendix K.